REMARKS

Claims remaining in the present Patent Application are Claims 1-24. The Applicants respectfully request reconsideration of the above captioned patent application in view of the remarks presented herein.

U.S.C. § 102

Claims 1-24 stand rejected under 35 U.S.C. § 102(e) as being allegedly unpatentable over Phillipps (WO 02/09362, "Phillipps"). Applicants have carefully reviewed the cited reference and respectfully assert that embodiments of the present invention as recited in Claims 1-4 are patentable over Phillipps.

With respect to Claim 1, Applicants respectfully assert that Phillipps does not teach or fairly suggest the limitation of "wherein said establishing bypasses a Bluetooth discovery process" as recited by Claim 1.

The rejection argues that Phillipps page 4 lines 1-2 teach this limitation. Applicants respectfully traverse. The cited sentence reads,

[i]f the user knows the Bluetooth Device Addresses of the printer 11, the user can manually select the appropriate entry in the list 20 so that the device 1 can form a piconet with the printer 11.

Applicants do not find this passage to teach or suggest anything about a Bluetooth discovery process, much less to teach or fairly suggest bypassing such a discovery process, as recited by Claim 1. Applicants respectfully assert that the whole of Phillipps is silent as to bypassing a Bluetooth discovery process, as recited by Claim 1.

For this reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Moreover, with respect to Claim 1, the Phillipps reference is replete with references that teach conventional operation of a Bluetooth device, including, "[t]the transceiver is adapted for ... transmission and reception according to the Bluetooth specification" (page 3 lines 18-19), and "Bluetooth devices perform a discovery operation to locate other Bluetooth devices..." (page 3 lines 27-28, emphasis added). These teachings of Phillipps teach toward conventional operation of a Bluetooth device, and would lead one of ordinary skill away from embodiments in accordance with the present invention that recite bypassing a Bluetooth discovery process, as recited by Claim 1.

For this additional reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Claims 2-6 depend from Independent Claim 1. Applicants respectfully assert that these Claims overcome the rejections of record as they depend from and allowable base claim, and respectfully solicit allowance of these Claims.

In addition, with respect to Claim 3, Applicants respectfully assert that Phillipps fails to teach or fairly suggest the limitation, "said device identification is entered by a user of said second hand held computer system" as recited by Claim 3.

The rejection argues that Phillipps page 3 line 34 – page 4 line 1 teach this limitation. Applicants respectfully traverse. The cited sentence reads (emphasis added),

[i]f the user knows the Bluetooth Device Addresses of the printer 11, the user can manually <u>select</u> the appropriate entry in the list 20 so that the device 1 can form a piconet with the printer 11.

Applicants understand this portion of Phillipps to teach <u>selection</u> of a Bluetooth Device Address from a list of Bluetooth Device Addresses. Applicants respectfully assert that "selection" from a list does not teach or fairly suggest <u>entry</u> of a Bluetooth device identification, as recited by Claim 3, as "entry" and "selection" are fundamentally different. For example, placing a call on a mobile phone is much different if the correct number is <u>selected</u> from a list, e.g., from an address book, than if <u>entered</u> manually, e.g., by depressing 7 to 10 digit keys.

For this additional reason, Applicants respectfully assert that Claim 3 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

In addition, with respect to Claim 6, Applicants respectfully assert that Phillipps fails to teach or fairly suggest the limitation,

> responsive to a failure of said (establishing a Bluetooth connection between said second hand held computer system and said first handheld computer system, wherein said establishing bypasses a Bluetooth discovery process) beginning said Bluetooth discovery process

as recited by Claim 6.

Applicants respectfully assert that Phillipps in its entirety is silent as to any response to a failure to establish a Bluetooth connection, much less to teach or fairly suggest beginning said Bluetooth discovery process responsive to such a failure, as recited by Claim 6. For example, Phillipps teaches two process steps of establishing a piconet (S5 of Figure 4 and S14 of Figure 5). Phillipps does not teach that these steps comprise other process steps responsive to a failure to establish a Bluetooth connection. Moreover, Phillipps teaches that these process steps lead directly to the end of the taught processes. Consequently, Phillipps is silent as to the presently recited limitation.

For this additional reason, Applicants respectfully assert that Claim 6 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

With respect to Claim 7, Applicants respectfully assert that Phillipps fails to teach or fairly suggest the limitation, "rejecting a Bluetooth communications request" as recited by Claim 7. Applicants understand the cited Figure 4 to teach a method of establishing a communication based upon membership in a list, and further, "[i]f a match is not found in the list, an error is signaled to the user (step s6)" (page 4 lines 10-11).

Applicants respectfully assert that this cited portion of Phillipps, as well as Phillipps in its entirety, are silent as to this limitation.

For this reason, Applicants respectfully assert that Claim 7 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Claims 8-12 depend from Independent Claim 7. Applicants respectfully assert that these Claims overcome the rejections of record as they depend from and allowable base claim, and respectfully solicit allowance of these Claims.

In addition with respect to Claim 10, Applicants respectfully assert that Phillipps fails to teach or fairly suggest the limitation "wherein said Bluetooth communications request is a page message" as recited by Claim 10.

The rejection alleges, "[i]n the Bluetooth communication protocol, the communication request inherently comprises a page message or an inquiry message." Applicants respectfully traverse. Assuming, *arguendo*, that a "communication request... comprises a page message or an inquiry message," the rejection <u>contradicts</u> itself. If a communication request can be <u>either</u> a page message or an inquiry message, then it is <u>not</u> inherent that such a request is a page message. Applicants respectfully assert that a Bluetooth communications request may take forms other than a page message.

The Examiner is invited to cite additional art teaching that a Bluetooth communication request is inherently a page message, or to withdraw the rejection.

For this additional reason, Applicants respectfully assert that Claim 10 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

With respect to Claim 13, Applicants respectfully assert that Claim 13 overcomes the rejections of record for at least the rationale previously presented with respect to Claim 1, and respectfully solicit allowance of this Claim.

Claims 14-18 depend from Independent Claim 13. Applicants respectfully assert that these Claims overcome the rejections of record as they depend from and allowable base claim, and respectfully solicit allowance of these Claims.

With respect to Claim 19, Applicants respectfully assert that Claim 19 overcomes the rejections of record for at least the rationale previously presented with respect to Claim 1, and respectfully solicit allowance of this Claim.

Claims 20-24 depend from Independent Claim 19. Applicants respectfully assert that these Claims overcome the rejections of record as they depend from and allowable base claim, and respectfully solicit allowance of these Claims.

CONCLUSION

Claims remaining in the present patent application are Claims 1-24. The Applicants respectfully request reconsideration of the above captioned patent application.

Applicants have reviewed the following references that were cited but not relied upon and do not find these references to teach or fairly suggest the present claimed invention: 6,463,276, 2003/0045272, 6,701,160, 2002/0090912.
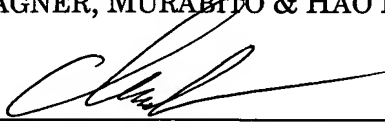
The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,

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